

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Gorski & Knowlton PC

By: Allen I. Gorski, Esquire

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In Re:

Jorge E. Nieves, Jr.

Debtor(s)

Chapter 13

Case No.: 17-12247-MBK

Judge: Michael B. Kaplan

**CERTIFICATION IN SUPPORT OF ALLEN I. GORSKI IN
OPPOSITION TO MOTION TO DISMISS CASE**

I, Allen I. Gorski, Esquire, of full age, hereby certify as follows:

1. I am a partner with the firm of Gorski & Knowlton, PC. Our firm represented the Debtor in a prior Chapter 13 bankruptcy.
2. We filed an Amended Proof of Claim (Doc. #1) in the amount of \$5,642.23. As the Debtor owns a property without a mortgage, the confirmed plan provides for 100% distribution to creditors from the proceeds of sale of the property.
3. There is a tremendous equity cushion protecting the City of Trenton and the City of Trenton will receive payment in full from the proceeds of sale.
4. The Debtor has proposed multiple sales of the property at 202 Perry Street, Trenton, New Jersey, including a sale to Samuel Lopez in August of 2020 for \$245,000.00, a sale to Victor Maria Rodriguez in March of 2021 for \$115,000.00, and to Samuel Lopez in August 2021 for \$110,000.00. Should the foreclosure proceed, the unsecured creditors would not be paid from a tax sale on the property.

5. We respectfully request that the Debtor be directed to maintain real estate tax payments and insurance pending the ultimate sale of the property and distribution of 100% to creditors.

I HEREBY CERTIFY under penalty of perjury that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Allen I. Gorski

Allen I. Gorski